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January 21, 2021

Luly Massaro, Clerk
Rhode Island Public Utilities Commission
Via e-mail

Re: Docket 5088 - Renewable Energy Growth (RE Growth) Program Year 2021

Dear Ms. Massaro,

I am writing regarding the recent testimony of the Division of Public Utilities and Carriers (the Division) consultant on the current proceeding regarding the Renewable Energy Growth Program.

The Division's testimony appears to imply that societal benefits should not be considered in the analysis of benefits and costs and that the only benefits that should be considered are those that are directly quantifiable benefits to ratepayers.

I want to call the PUC's attention to the Division's own testimony in Docket 4600 in its October 31, 2018 memo regarding Docket 4600 Framework Methodology. On page 17 of that document the Division states that: "We recommend that other societal costs associated with DERs be combined with societal benefits, to determine the net societal impacts. For example, environmental costs created by DERs should be subtracted from the environmental benefits, to provide a net impact. As another example, job and economic development impacts should include the net impacts." In section 6.3, starting on page 32, they go on to describe societal benefits that should be considered in any benefit - cost analysis specifically including reduced environmental impacts, economic development impacts, societal low income benefits, public health benefits and more.

As recommended by the Division in their October 31, 2018 Docket 4600 recommendations and as later confirmed in the stakeholder report accepted by the PUC as part of the Docket 4600 decision, societal benefits are clearly intended to be accounted for in the Benefit - Cost Framework that is supposed to now guide and inform all PUC decisions.

As you consider Docket 5088 and all your proceedings, please consider the determinations of the Docket 4600 proceeding that we all invested so much time, thought and effort into.

Thank you

A handwritten signature in blue ink, appearing to read 'Fred Unger', written over a light blue grid background.

Fred Unger